

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
---	---------------------------------------

This document relates to:

Estate of John Patrick O'Neill Sr., et al. v. The Republic of Iraq, et al., 1:04-cv-01076 (GBD)(SN)

Estate of John Patrick O'Neill Sr., et al. v. Al Baraka Investment and Development Corporations, et al., 1:04-cv-01923 (GBD)(SN)

Deborah Bodner, et al. v. Islamic Republic of Iran, No. 1:19-cv-11776 (GBD)(SN)

**DECLARATION OF JOHN F. SCHUTTY, ESQ.
IN SUPPORT OF APPLICATION TO SUBSTITUTE COUNSEL**

John F. Schutty, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury under the laws of the United States of America, that the following is true and correct:

1. I am an attorney admitted to practice before this Court. I submit this Declaration in support of a consent application (Local Civil Rule 1.4) to substitute my law firm, the Law Office of John F. Schutty, P.C., in the place and stead of the law office of Anderson Kill P.C., *et al.*, (Motley Rice LLC, Kreindler & Kreindler LLC, Law Office of John M. Quin and Brian Ballard, Esq. - "*et al.*"), on behalf of Plaintiff, Catherine McShane, Individually as Spouse and as Personal Representative of the Estate of Terence McShane, Deceased, and the adult children of Terence McShane, Plaintiffs Colin McShane, Sean McShane, and Aidan McShane. I am personally familiar and attest to the truth of the facts that follow below.

2. This MDL litigation is ongoing, and it is being handled by a Plaintiffs' Steering Committee, so there will be no prejudice to the Plaintiffs or the Defendants by the requested substitution of the Plaintiff's original counsel.

3. The attached “Consent” (Ex. A) shows that these Plaintiffs, their outgoing attorney (Jerry Goldman), and their incoming attorney (John F. Schutty), consent to the substitution.

4. Similar “Consents” have previously been filed for Plaintiffs Irene Dickey, Dara Seaman, Allison Wallice, Joanne Kelly, Susan Sliwak, Jacqueline Eaton-Garland, Lisa O’Brien, Eileen Lynch, Kristen Breitweiser and Patricia Ryan; those “Consents” also were signed by those Plaintiffs and certain other attorneys, and those substitutions by consent were previously “so-ordered” by this Court. *See, e.g.*, MDL ECF#3841.

5. In light of Plaintiffs’ wishes, and their attorneys’ consent, I respectfully request that this substitution be completed without delay, by the court “so-ordering” the attached “Consent.”

Dated: New York, New York
July 23, 2024

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

John F. Schutty
John F. Schutty (JS2173)
Law Office of John F. Schutty, P.C.
445 Park Avenue, 9th Floor
New York, NY 10022
Tel: (646) 345-1441
Fax: (917) 591-5980